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11/22/96



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

NOV 22 1996

SE-5J

**MEMORANDUM****DATE:**

**SUBJECT:** ACTION MEMORANDUM - Request for a Time Critical Removal Action at the Steger Industrial Paint Site, Cook County, Illinois.

**FROM:** Samuel Borries, On-Scene Coordinator  
Emergency Response Section II

**TO:** Richard Karl, Chief  
Emergency Response Branch

Site ID #A543

**I. PURPOSE**

The purpose of this Action Memorandum is to request and document approval to expend up to \$ 124,800 to abate an imminent and substantial threat to public health and the environment presented at the Steger Industrial Paint site, located at 434 E. 21 Street, Cook County, Chicago Heights, Illinois.

The site was referred to the United States Environmental Protection Agency (U.S. EPA) by the City of Chicago Heights for a removal assessment. As a result of the assessment the site was recommended for a removal action.

The proposed removal action seeks to abate the imminent and substantial threat to human health and the environment posed by the presence of wastes at the site in drums and open vats. The proposed removal action seeks to alleviate this threat by removing and disposing of these wastes. It is estimated that the removal action will require approximately 10 on-site working days to complete. This proposed removal action is considered time critical due to the presence of abandoned incompatible hazardous substances at the site.

The site is not included on the National Priorities List (NPL).

## II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # ILO 001 408 921

### Site Description and Background

The Steger Industrial Paint site is an abandoned facility located in a mix of industrial and residential areas. The nearest residential property is approximately 50 feet south of the facility. The site is approximately 3/4 acre. To the north there is undeveloped industrial property. East of the site there are undeveloped areas as well as residences. A woodworking/cabinet company is adjacent to the site to the west.

On April 18, 1996, U.S. EPA's On-Scene Coordinator (OSC) Samuel Borries and Superfund Technical Assessment and Response Team (START) member Raghu Nagam performed a removal assessment at the site. The assessment team observed drums, vats, fuel tanks, and other containers present on site. Also, bags of suspected asbestos containing materials were observed.

### Current Site Conditions

Approximately 30 drums are scattered throughout the site. Some of the drums are filled with solid materials, some are partially filled with liquids, and some are empty. The two open vats contain an estimated combined volume of approximately 1,500 to 2,000 gallons of liquids and solids.

The facility has been and continues to be used as a dumping ground. Approximately 500 abandoned tires have been dumped on site. The Tire Unit of the Illinois Environmental Protection Agency will be contacted to address these tires. Also, truck parts and frames, trailers, and general refuse are scattered on site. These objects will be moved around as needed to ensure workers protection, but will be left on site. The floors and walls appear to be heavily oil stained. A composite sampling from the floor material revealed less than ten (10) parts per million (ppm) of poly-chlorinated biphenyls (PCBs).

Results from the April 18 sampling event showed Ph values ranging from less than 1 to 12.87. Two of the samples taken had Ph measurements of less than 2. Grab samples of solid material collected from drums at the Steger Industrial Paint site were analyzed for total metals. Drum sample D2 indicated concentrations of up to 22,000 mg/kg of total lead in the drummed waste. A grab sample from a drum had an ignitability value of 122. A material with a value below 140 displays the characteristic of ignitability. A grab sample taken from a bag of suspected asbestos containing materials, revealed the materials to be up to 85% asbestos.

### **State and Local Authorities Role**

The City of Chicago Heights and the IEPA do not have sufficient funds or resources to conduct the removal of the hazardous wastes and hazardous substances found at this facility. The IEPA does not have a removal program in place with enough funds to perform the actions needed at this site to mitigate the threat to human health and the environment. The IEPA will continue to provide support to U.S. EPA during the removal efforts.

### **III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Conditions present at the Steger Industrial Paint site constitute an imminent and substantial threat to public health and the environment, based upon considerations as set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Section 300.415(b)(2). Accordingly, a time-critical removal action is the appropriate response action at the Steger Industrial Paint site. These conditions include, but are not limited to, the following:

- a) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

A site investigation conducted by the U.S. EPA documented that approximately 30 drums, 2 vats, fuel tanks, and other containers full or partially full of hazardous waste are present on site. Results from pH sampling showed levels between less than 1 and 12.87. According to 40 CFR § 261.22(a)(1), an aqueous solution with a pH of equal or less than 2, or equal or greater than 12.5 standard units, is considered to exhibit the criteria for corrosivity.

Samples taken during the removal assessment documented significant concentrations of total lead in the solid waste inside the drums, with results of up to 22,000 mg/kg. As stated in 40 CFR § 261.24, waste exhibits the characteristics of toxicity if, using the test methods described for determining TCLP, the waste level for lead is equal to or greater than 5.0 mg/l.

Site access to trespassers, vandals, and wildlife is partially restricted. The fence is partially destroyed in some areas. There are no gates or locks to restrict entrance to the property. There is evidence that the site has been used by homeless people as their place to sleep.

- b) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

Samples collected by the U.S. EPA indicate that hazardous substances are present on site. Results of pH screening reveal the presence of corrosive liquids. Many of the containers of hazardous or potentially hazardous substances are in poor condition. The uncontrolled and deteriorating state of the drums presents a further, more significant threat of release.

- c) The availability of other appropriate Federal or State response mechanisms to respond to the release;

The City of Chicago Heights referred this site to the U.S. EPA due to the lack of the necessary resources to undertake the clean up action or to respond to an emergency situation. The IEPA does not have a removal program in place with enough funds to perform the actions needed at this site to investigate the threat to human health and the environment. The IEPA will continue to provide support to U.S. EPA during the removal action.

- d) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The present condition of the vats, drums, containers, and tanks present on site, pose the threat of release and/or migration of contaminants. Normal seasonal precipitation levels and multiple freeze/thaw cycles could further deteriorate containers compounding the potential for off site migration of contaminants.

#### IV. ENDANGERMENT DETERMINATION

Open vats and improperly stored drums at the Steger Industrial Paint site contain corrosive liquids and lead. These wastes pose potential inhalation, ingestion, and contact hazards to surrounding residents in this mixed residential/commercial area.

Given the present site conditions, the nature of hazardous substances on-site, and the potential exposure pathways described in Section III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, present an imminent and substantial endangerment to public health, welfare, or the environment.

#### V. PROPOSED ACTIONS AND ESTIMATED COSTS

##### A. Proposed Actions

##### 1. Proposed Action Description

The purpose of this removal action is to mitigate the imminent and substantial threats posed to public health or welfare or the environment from wastes at the site. The proposed immediate response action includes the following actions:

- 1) A site safety plan will be prepared and implemented. The site will be secured to the extent practicable for completion of site activities.
- 2) The contents of vats, drums, and any other containers will be segregated, staged, sampled, and categorized for disposal. Compatible waste streams will be bulked and disposed of off-site.
- 3) All vats, tanks, drums, and other containers will be decontaminated, recycled, and/or disposed of as necessary. Underlying and surrounding floor/soil/debris around the all containers will be addressed as necessary (e.g., sampling, consolidation, and disposal).
- 4) Floors and walls will be sampled to determine the need for decontamination. If the floors and walls are contaminated they will be decontaminated if possible and left intact.
- 5) The bags of suspected asbestos containing materials that have been disposed of on site, will be addressed to ensure workers safety.

Waste transportation and disposal will be handled in full compliance with the U.S. EPA's Off-Site Disposal Rule, 40 CFR Section 300.440. Provisions for post-removal site control are not anticipated, as all wastes will be removed from the site and remaining structures will be decontaminated, as needed, to remove hazardous substances.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

## 2. Contribution to Remedial Performance

The Steger Industrial Paint site is a non-NPL site for which remedial actions have not been planned to date. The proposed removal action will address all threats meeting the NCP Section 300.415(b)(2) removal criteria as identified in Section III of this Action Memorandum.

### 3. Applicable or Relevant and Appropriate Requirements (ARARs)

All Federal ARARs and any Illinois ARARs identified in a timely manner will be complied with to the extent practicable. A letter has been sent to Tom Crause of IEPA requesting that the state identify state ARARs.

### 4. Project Schedule

It is estimated that the removal will be completed in 10, ten hour working days.

### B. Estimated Costs

The estimated costs of the recommended action are summarized below. The detailed ERCS contractor costs and initial cost projection scenario are presented in Attachment A. The estimated costs are as follows:

#### EXTRAMURAL COSTS

Clean Up Contractor Costs	\$ 71,000
Contingency (20%)	14,200
Subtotal	85,200
START	10,000
Total Extramural Costs	95,200
Extramural Contingency (15%)	14,300
<b>TOTAL, EXTRAMURAL COSTS</b>	<b>\$109,500</b>

#### INTRAMURAL COSTS

U.S. EPA Direct costs \$30/hr (100 Regional + 20 HQ)	\$ 3,600
U.S. EPA Indirect Costs \$61/hr (100 Regional Hrs)	6,100
<b>TOTAL, INTRAMURAL COSTS</b>	<b>\$ 9,700</b>
<b><u>TOTAL REMOVAL PROJECT CEILING</u></b>	<b><u>\$119,200</u></b>

#### **VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

The current site conditions, the nature of the hazardous substances on-site, and the potential exposure pathways to the nearby population described in Sections II and III, if not addressed by implementing the response actions selected in this Action Memorandum, present an imminent and substantial endangerment to the public health, or welfare, or the environment. Implementation of the response actions selected in this Action Memorandum will mitigate the actual or threatened releases of hazardous substances from this site.

Without undertaking the aforementioned actions releases may occur due to rupture of drums, vats, and containers within the site premises. Additional spillage to the facility's work area could result in an overflow of hazardous wastes to the sanitary sewer, street or neighboring properties. A release of wastes to surrounding properties will contribute and ultimately lead to increased risks to public health and the environment.

#### **VII. OUTSTANDING POLICY ISSUES**

There are no outstanding policy issues for the Steger Industrial Paint site.

#### **VIII. ENFORCEMENT**

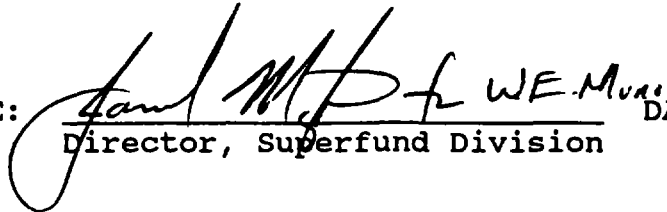
For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum (Attachment B).

#### **IX. RECOMMENDATION**

This decision document represents the selected removal action for the Steger Industrial Paint site, Chicago Heights, Cook County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. Conditions at the site meet the criteria of Section 300.415 (b)(2) of the NCP for a removal action and I recommend your approval of the proposed removal action. The total project ceiling requested

is \$119,200. Of this, an estimated \$99,500 may be used for cleanup contractor costs. You may indicate your decision by signing below:

APPROVE:

  
Director, Superfund Division

DATE:

11/22/96

DISAPPROVE:

\_\_\_\_\_  
Director, Superfund Division

DATE:

\_\_\_\_\_

ATTACHMENTS: A. ERCS Contractor Costs  
B. Enforcement Confidential Addendum  
C. Administrative Record Index

cc: E. Watkins, U.S. EPA HQ, 5202G  
D. Henne, U.S. Department of the Interior  
B. Everretts, IEPA



PAGE 9: BCC LIST

HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

**ATTACHMENT A**

**ERCS CONTRACTOR COSTS  
STEGE INDUSTRIAL PAINT SITE  
NOVEMBER 1996**

PERSONNEL	26,000
EQUIPMENT	15,000
MATERIALS	5,000
SUBCONTRACTORS	0
TRANSPORTATION	10,000
<u>DISPOSAL</u>	<u>15,000</u>
TOTAL	\$71,000

ATTACHMENT B  
ENFORCEMENT ADDENDUM  
NOVEMBER 1996  
ENFORCEMENT CONFIDENTIAL  
2 PAGES

REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

## ATTACHMENT C

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL ACTIONADMINISTRATIVE RECORD  
FOR  
STEGER INDUSTRIAL PAINT SITE  
CHICAGO HEIGHTS, COOK COUNTY, ILLINOISORIGINAL  
NOVEMBER 6, 1996

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
04/23/96	Kawecki, J., U.S. EPA	Guria, B., U.S. EPA	Interview Summary w/C. Weber re: Steger Industrial Paint Site (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED)	1
07/31/96	Ecology and Environment, Inc.	U.S. EPA	Site Assessment Report	66
08/01/96	Karl, R., U.S. EPA	Weber, C.	Letter re: General Notice of Potential Liability (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED)	3
00/00/00	Vega, S., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request for a Time Critical Removal Action at the Steger Industrial Paint Site (PENDING)	